

UNITED STATES DISTRICT COURT
DISTRICT OF MARYLAND

MALCOLM ROSENWALD, *Derivatively*
On Behalf of Nominal Defendant
MBNA CORPORATION,

Plaintiff,

—versus—

LAURA S. UNGER, *et al.*,

Defendants,

—and—

MBNA CORPORATION,

Nominal Defendant.

* * * * *

BRIEFING STIPULATION AND PROPOSED ORDER

The parties to the above-captioned proceeding, by and through undersigned counsel, come before this honorable Court to stipulate, and request the Court order, as follows:

1. On or about August 26, 2005, Defendants filed Defendants' Motion To Transfer This Action To The District Of Delaware Or, In The Alternative, To Stay This Action ("Defendants' Transfer / Stay Motion"), with accompanying memorandum of law and attachments.

2. Plaintiff shall have until on or before Monday, September 19, 2005 to file an opposition to Defendants' Transfer / Stay Motion.

3. Defendants shall have until on or before Friday, September 30, 2005 to file a Reply to Plaintiff's opposition to Defendants' Transfer/Stay Motion.

Respectfully submitted,

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Markowitz, Milstead, and Murdough*

It is SO ORDERED, this _____ day of September, 2005,

The Honorable Catherine C. Blake,
United States District Court Judge